

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

	X
In re:	:
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	: PROMESA : Title III
as representative of	: Case No. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	: (Jointly Administered)
Debtors. ¹	:
	X
In re:	:
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	: PROMESA : Title III
as representative of	: Case No. 17-BK-3567 (LTS)
THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY,	:
Debtor.	:
	X

**LIMITED JOINDER OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS IN
SUPPORT OF FOMB AND AAFAF CONSOLIDATED RESPONSE TO MOVANTS'
CONSOLIDATED SUPPLEMENTAL BRIEF REGARDING REVENUE BOND LIFT
STAY MOTIONS**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors (the “Committee”)² hereby files this limited joinder (the “Limited Joinder”) in support of the Financial Oversight and Management Board for Puerto Rico’s (“Oversight Board”) and Puerto Rico Fiscal Agency and Financial Advisory Authority’s (“AAFAF”) *FOMB and AAFAF Consolidated Response to Movants’ Consolidated Supplemental Brief Regarding Revenue Bond Lift Stay Motions* (the “Response”) [Docket. No. 13905 in Case No. 17-3283], filed in response to the *Movants’ Consolidated Supplemental Brief Regarding Revenue Bond Lift Stay Motions* [Docket No. 13744 in Case No. 17-3283]. In connection with the Response, the Committee respectfully states as follows:

1. The Committee hereby joins the Response except for paragraphs 1-27, footnote 31, paragraph 35, paragraphs 42-43, paragraphs 46-50, and the phrase “and (d)(2)” in paragraph 52. For the avoidance of doubt, the Committee does not join the Oversight Board or AAFAF with respect to any paragraph or statement regarding (a) the propriety of the Commonwealth’s retention of the hotel occupancy tax or other allocable revenues, or (b) any suggestion that revenue bondholders or the instrumentalities may have unsecured claims against the Commonwealth. The Committee reserves its rights to adopt any arguments that it has not expressly joined in the future in this or other proceedings.

CERTIFICATION

Pursuant to Section 9 of the *Final Case Management Order for Revenue Bonds* [Docket No. 12186 in Case No. 17-3283], the Committee certifies that it has taken reasonable efforts by

² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

coordinating with the Oversight Board and AAFAF to avoid duplicative briefing or to avoid submitting a brief that is longer than necessary.

WHEREFORE, the Committee respectfully requests that this Court deny the Movants' relief from the stay.

Dated: July 31, 2020

By: /s/ Luc A. Despins

PAUL HASTINGS LLP
Luc A. Despins, Esq. (*Pro Hac Vice*)
James R. Bliss, Esq. (*Pro Hac Vice*)
James B. Worthington, Esq. (*Pro Hac Vice*)
G. Alexander Bongartz, Esq. (*Pro Hac Vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
lucdespins@paulhastings.com
jamesbliss@paulhastings.com
jamesworthington@paulhastings.com
alexbongartz@paulhastings.com

Counsel to the Official Committee of Unsecured Creditors

By: /s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC
Juan J. Casillas Ayala, Esq. (USDC - PR 218312)
Israel Fernández Rodríguez, Esq. (USDC - PR 225004)
Juan C. Nieves González, Esq. (USDC - PR 231707)
Cristina B. Fernández Niggemann, Esq. (USDC - PR 306008)
PO Box 195075
San Juan, Puerto Rico 00919-5075
Telephone: (787) 523-3434
Fax: (787) 523-3433
jcasillas@cstlawpr.com
ifernandez@cstlawpr.com
jnieves@cstlawpr.com
crfernandez@cstlawpr.com

Local Counsel to the Official Committee of Unsecured Creditors